

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Jomaire A. Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
1300 I. Street, N.W., Suite 900
Washington, D.C. 20005
Telephone: 202-538-8000
Facsimile: 202-538-8100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF VIOLA TREBICKA
IN SUPPORT OF DEFENDANT GOOGLE
LLC'S RESPONSES AND OBJECTIONS
TO SPECIAL MASTER'S REPORT AND
ORDERS ON REFERRED DISCOVERY
ISSUES**

Referral: Hon. Susan van Keulen, USMJ

1 I, Viola Trebicka, declare as follows:

2 1. I am a member of the bar of the State of California and a partner with Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make this
4 declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could
5 and would testify competently thereto.

6 2. I submit this declaration in support of Google’s Responses and Objections to Special
7 Master’s Report and Order on Referred Discovery Issues (Dkt. 299).

8 3. Attached hereto as **Exhibit 1** is a true and correct copy of Google’s October 1, 2021
9 letter to the Special Master and Plaintiffs’ counsel in *Calhoun v. Google*, Case No. 5:20-cv-5146, in
10 response to the Special Master’s request for an explanation of technical burden associated with
11 Google providing the additional information that Plaintiffs’ counsel in *Calhoun* requested.

12 4. Attached hereto as **Exhibit 2** is a true and correct copy of a document produced by
13 Google to Plaintiffs bearing Bates stamp GOOG-BRWN-00029004 – GOOG-BRWN-00029009.

14 5. Attached hereto as **Exhibit 3** is a true and correct copy of a document produced by
15 Google to Plaintiffs bearing Bates stamp GOOG-BRWN-00029326 – GOOG-BRWN-00029327.

16 6. Attached hereto as **Exhibit 4** is a true and correct copy of a diagram of the data and
17 data-flow at issue in this litigation that Google sent to the Special Master and Plaintiffs’ counsel on
18 October 17, 2021.

19
20 I declare under penalty of perjury of the laws of the United States that the foregoing is true and
21 correct. Executed in Los Angeles, California on October 27, 2021.

22
23 DATED: October 27, 2021

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

24
25
26 By 

Viola Trebicka

27 Attorney for Defendant